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THE UNITED STATES DISTRICT COURT
Middle District of Pennsylvania
Harrisburg, PA

Yan SHAO

Plaintiff,

v.

Edward Cuccia

Charles Day

John / Jane Doe

Law Offices of Ferro & Cuccia

Defendants.

No. 1:00 CV 1901
(JUDGE Rambo)

CIVIL ACTION - LAW

FILED
HARRISBURG, PA

FEB 03 2003

MARY E. D'ANDREA, CLERK
Per 9/18
Deputy Clerk

PLAINTIFF'S MOTION SEEKING LEAVE OF COURT TO EXAMINE PAMELA
DAY VIA DEPOSITION UPON WRITTEN QUESTIONS

MAY IT PLEASE THE COURT, the plaintiff moves this Court to permit her to examine Pamela Day as to her assets and as to certain other matters, which have been raised by Charles and Pamela Day by means of statements made by them in court under oath on January 28, 2003. The undersigned notes that while objection was made on January 28 to the propriety of seeking information from Ms. Day via interrogatories, both Ms. Day and Mr. Day conceded that responses could be sought by means of the deposition of a non-party as permitted by Rule 31 of the rules of discovery.

WHEREFORE, the plaintiff respectfully moves this Court to permit her to conduct a deposition of Ms. Pamela Day via written questions.